

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE DPP BEEF ANTITRUST
LITIGATION

Case No. 20-cv-1319-JRT-HB

This document relates to:

ALL CASES

**DECLARATION OF ULRIKE CONNELLY IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO
COMPEL DATA AND DOCUMENTS**

I, Ulrike (Rike) Connelly, declare as follows:

1. I am a partner with the law firm of Perkins Coie, LLP, and I represent Defendants Tyson Foods, Inc. and Tyson Fresh Meats, Inc. (collectively, "Tyson") in the above-entitled matter. I make this Declaration in Support of the Defendants' Opposition to Plaintiffs' Motion to Compel Data and Documents and am competent to do so.

2. Tyson has also offered Jason Robertson, who is currently employed by Tyson Fresh Meats as the Vice President of Case Ready Beef and Pork Optimization. He has held this role since March 2009. Mr. Robertson has been employed by Tyson for roughly twenty (20) years. In addition, the senior executives of Tyson Fresh Meats that are already custodians (Steve

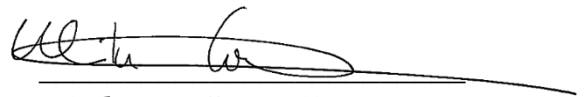
Stouffer, Shane Miller, and Jerry Holbrook) would also be expected to have case-ready materials in their records and documents.

3. To date, Tyson has produced eleven years' worth of cattle procurement and slaughter structured data along with over 15,000 documents containing regular reports on cattle procurement, slaughter levels, and beef sales.

4. At no point during structured data negotiations did Plaintiffs clarify that they were asking Tyson to produce case-ready profit-and-loss information, and as a result, Tyson never agreed to produce such data. ECF No. 595-14 (Herrera Decl., Ex. N at 7). On July 26, 2022, Tyson alerted Plaintiffs to this mistake on a call, and followed-up in a July 27, 2022 email.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 4th day of August, 2022, in Seattle, Washington.


Ulrike R. Connelly